



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10  
1200 Sixth Avenue, Suite 900  
Seattle, WA 98101-1128

Office of  
Air, Waste and Toxics

January 10, 2014

JOSH L REYNOLDS  
ALUTIIQ OILFIELD SOLUTIONS, LLC  
PO BOX 340066  
DEADHORSE, AK 99734

**2A – Notification**  
**AK** 3484  
**1/10/14**

Re: Site EPA ID Number: AKR000203489  
Site Name: ALUTIIQ OILFIELD SOLUTIONS, LLC  
Site Location Address: LOT 6, BLOCK 302 DEADHORSE, AK 99734

Dear Sir/Madam:

Every two years, the U.S. Environmental Protection Agency (EPA) collects information from Large Quantity Generators of hazardous waste (LQG) and hazardous waste Treatment, Storage and Disposal Facilities (TSDF) as required by the Resource Conservation and Recovery Act (RCRA). This information is collected via the 2013 Hazardous Waste Report (HWR), also known as the "Biennial Report" (BR). This letter is to inform you how to submit that information.

Our records show that your site generator status in 2013 was a Conditionally Exempt Small Quantity Generator (CESQG). Based on this information, you are not required to submit the 2013 BR. However, if your site became an episodic or short-term LQG during any single calendar month in 2013, you are required to report all of your generated hazardous waste for 2013. You must submit the 2013 Biennial Report by March 1, 2014.

Please read the definition below to determine if your site was an LQG.

**DEFINITION OF A RCRA LARGE QUANTITY GENERATOR  
THAT MUST REPORT FOR CALENDAR YEAR 2013**

A site is a RCRA Large Quantity Generator (LQG) for 2013 if the site met **any** of the following criteria:

- (a) The site generated, **in any single calendar month**, 1000 kg (2200 lbs) or more of RCRA non-acute hazardous waste; **or**
- (b) The site generated, **in any single calendar month**, or accumulated at any time, more than 1 kg (2.2 lbs) of RCRA acute hazardous waste; **or**
- (c) The site generated, **in any single calendar month**, or accumulated at any time, more than 100 kg (220 lbs) of spill cleanup material contaminated with RCRA acute hazardous waste.

NOTE: Generators must total (or count) the quantity of all hazardous wastes generated per month. The regulations stating which hazardous wastes are counted in a generators monthly quantity determination are found in 40 CFR 261.5(c) and (d).

NOTE: You will report your current Hazardous Waste Generator status as of the date you submit your 2013 Hazardous Waste Report on the Site Identification Form in Item 10.A.1 - Generator of Hazardous Waste. Your current status may be different from the status during the report year that requires you to file the Hazardous Waste Report.

NOTE: Hazardous waste imported from a foreign country in 2013 must be counted in determining your generator status. This waste must be reported on the Waste Generation and Management (GM) Form or the Waste Received From Offsite (WR) Form in your 2013 Hazardous Waste Report.

(over)

### **What to do if you were not an LQG in 2013**

If you were **not** an LQG in 2013, you are **not** required to submit the 2013 Hazardous Waste Report. However, you should notify us if any relevant information has changed, such as site name, location address, legal owner or generator status. If you need to update any of these, please download, complete and sign the "RCRA Subtitle C Site Identification Form" (EPA Form 8700-12) from:

<http://www.epa.gov/epawaste/inforesources/data/form8700/8700-12.pdf>

Complete the required information on the form and indicate your current generator status in item 10A. In addition, we ask that you indicate your 2013 hazardous waste generator status in the comments section of the form (Section 13).

### **How to submit your 2013 Hazardous Waste Report**

If you were an LQG in any single calendar month in 2013, you are required to submit the 2013 Hazardous Waste Report. EPA Region 10's preferred software for accepting BR submissions is the "BRState" program, developed at no cost by the Florida State Department of Environmental Protection. This program can be installed on any PC running the Microsoft Windows operating system. The BRState software and installation instructions can be downloaded from the EPA web site at:

<http://yosemite.epa.gov/r10/owcm.nsf/webpage/RCRAInfo+z>

This website also contains a link to the *2013 Hazardous Waste Report Form and Instructions*. If you are unable to download the program, please contact us and request that a CD be mailed to you.

### **Where to mail your Biennial Report and Site Identification Forms**

U.S. Environmental Protection Agency Region 10  
ATTN: Hazardous Waste Report Coordinator  
1200 Sixth Avenue, Suite 900, M/S: AWT-122  
Seattle, WA 98101-3140

Should you have any questions or need assistance, send an e-mail to [erickson.ofelia@epa.gov](mailto:erickson.ofelia@epa.gov) or call (206) 553-2583; or contact Ted Enderle at [enderle.ted@epa.gov](mailto:enderle.ted@epa.gov) or call (206) 553-6703.

Thank you for your attention to this important report. We look forward to receiving your 2013 BR by March 1, 2014.

Sincerely,



Ofelia S. Erickson  
Hazardous Waste Report Coordinator



## Site ID Confirmation

ALUTIIQ OILFIELD SOLUTIONS,  
LLC

DEADHORSE

AKR000203489

Last Updated By: EOT

Last Updated On: 12/03/2009

## General Information

Received Date:	11/30/2009	Non-notifier:	
Number of Employees:		Extract to Public? <input checked="" type="checkbox"/>	Send Acknowledgement:
Accessibility:			

## 1. Reason for Submittal (You must select at least one.)

<input checked="" type="checkbox"/>	To provide initial notification (to obtain an EPA ID Number for hazardous waste, universal waste, or used oil activities). [Source N]
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## 2. Site ID

EPA ID:	AKR000203489	Activity Location:	AK
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## 3. Site Name

Name:	ALUTIIQ OILFIELD SOLUTIONS, LLC
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## 4. Site Location (Physical address, not P.O. Box or Route)

Number:			
Street 1:	LOT 6, BLOCK 302		
Street 2:	DEADHORSE AIRPORT		
City:	DEADHORSE	State:	Alaska
Zip Code:	99734	County:	NORTH SLOPE
State District:			

## 5. Site Land Type

Site Land Type:	State
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6. North American Industry Classification System (NAICS) [Hint](#)

A. 213112
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## 7. Site Mailing Address

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Number:			
Street 1:	PO BOX 340066		
Street 2:			
City:	DEADHORSE	State:	ALASKA
Zip Code:	99734	Country:	UNITED STATES

**8. Site Contact Person**

First Name:	JOSH	Middle Initial:	L	Last Name:	REYNOLDS
Phone Number:	907-659-9846 Extension:		Email Address:	IREYNOLDS@ALUTIIQ.COM	

**8a. Site Contact Address**

Number:			
Street 1:	PO BOX 340066		
Street 2:			
City:	DEADHORSE	State:	ALASKA
Zip Code:	99734	Country:	UNITED STATES

**9. Legal Owner and Operator** [Hint](#)**A. Legal Owner**

Seq.	Ind.	Type	Name	Address	Date Became Current	Date Ended Current
2	Current	Private	ALUTIIQ, LLC, AFOGNAK NATIVE CORP Phone: Dunn Bradstreet Number:	3909 ARCTIC BLVD, STE 400 ANCHORAGE AK 99503 US	05/01/2009	

**B. Legal Operator**

Seq.	Ind.	Type	Name	Address	Date Became Current	Date Ended Current
1	Current	Private	ALUTIIQ OILFIELD SOLUTIONS Phone: Dunn Bradstreet Number:		06/29/2009	

**10. Type of Federal Regulated Waste Activity**

<b>A. Hazardous Waste Activity</b>	
<b>1. Generator of Hazardous Waste (Federal)</b>	<b>For items 2 through 6, check all that apply.</b>
Conditionally Exempt SQG	<input type="checkbox"/> <b>2. Transporter of Hazardous Waste</b>
<b>Indicate other generator activities (check all that apply).</b>	<input type="checkbox"/> <b>3. Treater, Storer, or Disposed of Hazardous Waste ...</b>
<input type="checkbox"/> d. United States Importer of Hazardous Waste	<input type="checkbox"/> <b>4. Recycler of Hazardous Waste ...</b>
<input type="checkbox"/> e. Mixed Waste (hazardous and radioactive) Generator	<b>5. Exempt Boiler and / or Industrial Furnace</b>
<b>Generator of Hazardous Waste (State)</b>	<input type="checkbox"/> a. Small Quantity On-site Burner Exemption
cesqg	<input type="checkbox"/> b. Smelting, Melting, Refining Furnace, Exemption
	<input type="checkbox"/> <b>6. Underground Injection Control</b>
<b>B. Universal Waste Activities</b>	<b>C. Used Oil Activities</b>
<b>1. Large Quantity Handler of Universal Waste ...</b>	<b>1. Used Oil Transporter - Indicate types of activities.</b>
Generated Accumulated/Managed	<input type="checkbox"/> a. Transporter
Batteries <input type="checkbox"/>	<input type="checkbox"/> b. Transfer Facility
Mercury containing equipment <input type="checkbox"/>	<b>2. Used Oil Processor and / or Re-refiner - Indicate types of activities.</b>
Pesticides <input type="checkbox"/>	<input type="checkbox"/> a. Processor
Lamps <input type="checkbox"/>	<input type="checkbox"/> b. Re-refiner
<input type="checkbox"/> <b>2. Destination Facility for Universal Waste ...</b>	<input type="checkbox"/> <b>3. Off-Specification Used Oil Burner</b>
	<b>4. Used Oil Fuel Marketer - Indicate types of activities.</b>
	<input type="checkbox"/> a. Marketer Who Directs Shipment of Off-Specification Used Oil to Off-Specification Used Oil Burner
	<input type="checkbox"/> b. Marketer Who First Claims the Used Oil Meets the Specifications
<b>D. State Activities</b>	

**11. Description of Hazardous Waste** Hint

Type D	Type F	Type K	Type P	Type U	Type X
D001 D035	F003 F005				

**12. Comments**

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**13. Certification** [Read the certification.](#)

First Name:	M.I.:	Last Name:	Title:	Date Signed:
JOSH		REYNOLDS	HSE MANAGER	10/09/2009


[Continue to the Handler Main Menu](#)

URL: /rcrainfo/handler/siteidconfirmation.jsp

RECEIVED

OMB#: 2050-0028 Expires 06/30/2009

NOV 30 2009

<b>SEND COMPLETED FORM TO:</b> The Appropriate State or EPA Regional Office.	United States Environmental Protection Agency Office of Air Waste & Toxics <b>RCRA SUBTITLE C SITE IDENTIFICATION FORM</b>		
<b>1. Reason for Submittal</b> (See instructions on page 13.)  MARK ALL BOX(ES) THAT APPLY	<b>Reason for Submittal:</b> <input checked="" type="checkbox"/> To provide Initial Notification of Regulated Waste Activity (to obtain an EPA ID Number for hazardous waste, universal waste, or used oil activities) <input type="checkbox"/> To provide Subsequent Notification of Regulated Waste Activity (to update site identification information) <input type="checkbox"/> As a component of a First RCRA Hazardous Waste Part A Permit Application <input type="checkbox"/> As a component of a Revised RCRA Hazardous Waste Part A Permit Application (Amendment # _____) <input type="checkbox"/> As a component of the Hazardous Waste Report		
<b>2. Site EPA ID Number</b> (page 14)	EPA ID Number <u>AKR 000 20 34 89</u>		
<b>3. Site Name</b> (page 14)	Name: <u>Alutiig Oilfield Solutions, LLC</u>		
<b>4. Site Location Information</b> (page 14)	Street Address: <u>Lot 6, Block 302 Deadhorse Airport</u>		
	City, Town, or Village: <u>Deadhorse</u>	State: <u>AK</u>	
	County Name: <u>Barrow Recording District</u>	Zip Code: <u>99734</u>	
<b>5. Site Land Type</b> (page 14)	Site Land Type: <input type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input checked="" type="checkbox"/> State <input type="checkbox"/> Other		
<b>6. North American Industry Classification System (NAICS) Code(s) for the Site</b> (page 14)	A. <u>2113112</u>	B. _____	
	C. _____	D. _____	
<b>7. Site Mailing Address</b> (page 15)	Street or P. O. Box: <u>PO Box 340006</u>		
	City, Town, or Village: <u>Deadhorse</u>		
	State: <u>Alaska</u>		
	Country: <u>USA</u>	Zip Code: <u>99734</u>	
<b>8. Site Contact Person</b> (page 15)	First Name: <u>Josh</u>	MI: <u>L</u>	Last Name: <u>Reynolds</u>
	Phone Number: <u>907-659-9846</u> Extension: _____		Email address: <u>jreynolds@alutiig.com</u>
	Date Became Operator (mm/dd/yyyy): <u>6/29/2009</u>		
<b>9. Operator and Legal Owner of the Site</b> (pages 15 and 16)	A. Name of Site's Operator: <u>Alutiig Oilfield Solutions</u>		Date Became Operator (mm/dd/yyyy): <u>6/29/2009</u>
	Operator Type: <input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other		
	B. Name of Site's Legal Owner: <u>Alutiig, LLC / Afognak Native Corp.</u>		Date Became Owner (mm/dd/yyyy): <u>5/1/2009</u>
	Owner Type: <input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other		

Searches -  
have - none

Aggravated assault - 1st degree

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EPA ID NO:

AK R000203489

OMB#: 2050-0028 Expires 06/30/2009

<b>9. Legal Owner (Continued) Address</b>	<b>Street or P. O. Box:</b> 3909 Arctic Blvd., Suite 400	
	<b>City, Town, or Village:</b> Anchorage	
	<b>State:</b> Alaska	
	<b>Country:</b> USA	<b>Zip Code:</b> 99503

**10. Type of Regulated Waste Activity**  
Mark "Yes" or "No" for all activities; complete any additional boxes as instructed. (See instructions on pages 17 to 20.)

**A. Hazardous Waste Activities**  
Complete all parts for 1 through 6.

☒ ☐ **1. Generator of Hazardous Waste**  
If "Yes", choose only one of the following - a, b, or c.

☐ a. LQG: Greater than 1,000 kg/mo (2,200 lbs./mo.) of non-acute hazardous waste; or

☐ b. SQG: 100 to 1,000 kg/mo (220 - 2,200 lbs./mo.) of non-acute hazardous waste; or

☒ c. CESQG: Less than 100 kg/mo (220 lbs./mo.) of non-acute hazardous waste

In addition, indicate other generator activities.

☐ ☒ d. United States Importer of Hazardous Waste

☐ ☒ e. Mixed Waste (hazardous and radioactive) Generator

☐ ☒ **2. Transporter of Hazardous Waste**

☐ ☒ **3. Treater, Storer, or Disposer of Hazardous Waste (at your site)** Note: A hazardous waste permit is required for this activity.

☐ ☒ **4. Recycler of Hazardous Waste (at your site)**

☒ ☐ **5. Exempt Boiler and/or Industrial Furnace**  
If "Yes", mark each that applies.

☒ a. Small Quantity On-site Burner Exemption

☐ b. Smelting, Melting, and Refining

☐ ☒ **6. Underground Injection Control**

**B. Universal Waste Activities**

☐ ☒ **1. Large Quantity Handler of Universal Waste (accumulate 5,000 kg or more) [refer to your State regulations to determine what is regulated]. Indicate types of universal waste mark all boxes that apply:**

	<u>Manage</u>
a. Batteries	<input type="checkbox"/>
b. Pesticides	<input type="checkbox"/>
c. Mercury containing equipment	<input type="checkbox"/>
d. Lamps	<input type="checkbox"/>
e. Other (specify) _____	<input type="checkbox"/>
f. Other (specify) _____	<input type="checkbox"/>
g. Other (specify) _____	<input type="checkbox"/>

☐ ☒ **2. Destination Facility for Universal Waste**  
Note: A hazardous waste permit may be required for this activity.

**C. Used Oil Activities**  
Mark all boxes that apply.

☐ ☒ **1. Used Oil Transporter**  
If "Yes", mark each that applies.

☐ a. Transporter

☐ b. Transfer Facility

☐ ☒ **2. Used Oil Processor and/or Re-refiner**  
If "Yes", mark each that applies.

☐ a. Processor

☐ b. Re-refiner

☐ ☒ **3. Off-Specification Used Oil Burner**

☐ ☒ **4. Used Oil Fuel Marketer**  
If "Yes", mark each that applies.

☐ a. Marketer Who Directs Shipment of Off-Specification Used Oil to Off-Specification Used Oil Burner

☐ b. Marketer Who First Claims the Used Oil Meets the Specifications

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EPA ID NO: AKR 000 203 489

OMB#: 2050-0028 Expires 06/30/2009

**11. Description of Hazardous Wastes (See instructions on page 21.)**

**A. Waste Codes for Federally Regulated Hazardous Wastes.** Please list the waste codes of the Federal hazardous wastes handled at your site. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112). Use an additional page if more spaces are needed.


F003	D035					
D001						
F005						

**B. Waste Codes for State-Regulated (i.e., non-Federal) Hazardous Wastes.** Please list the waste codes of the State-regulated hazardous wastes handled at your site. List them in the order they are presented in the regulations. Use an additional page if more spaces are needed for waste codes.


**12. Comments (See instructions on page 21.)**


**13. Certification.** I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

For the RCRA Hazardous Waste Part A Permit Application, all operator(s) and owner(s) must sign (see 40 CFR 270.10 (b) and 270.11). (See instructions on page 21.)

Signature of operator, owner, or an authorized representative	Name and Official Title (type or print)	Date Signed (mm/dd/yyyy)
	Josh Reynolds, HSE Manager	10/9/2009

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**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10**

1200 Sixth Avenue, Suite 900  
Seattle, WA 98101-3140

OFFICE OF  
AIR, WASTE AND TOXICS

December 3, 2009

Josh L. Reynolds  
Alutiiq Oilfield Solutions, LLC  
P.O. Box 340066  
Deadhorse, AK 99734

RE: Site EPA ID Number: AKR000203489  
Site Name: Alutiiq Oilfield Solutions, LLC  
Site Location: Lot 6, Block 302 Deadhorse Airport; Deadhorse, AK 99734

Dear Mr. Reynolds:

The United States Environmental Protection Agency (EPA) has received your RCRA Subtitle C Site Identification Form (Standard Form 8700-12) requesting that an EPA identification (ID) number be issued for the location described above. This provides you with a written confirmation of your EPA ID number, which is AKR000203489.

Your EPA ID number should be placed on all reports and correspondence with EPA and must be included on shipping manifests when hazardous wastes are moved from a generator's site to another location for storage, treatment or disposal to an EPA permitted Treat/Store/Dispose (TSD) facility. Transporters of hazardous waste must apply for and place on the manifest, their own EPA hazardous waste ID number.

Enclosed is a pamphlet that will give you an overview and basic understanding of the hazardous waste regulations. For complete federal hazardous waste regulations, please refer to Title 40 of the Code of Federal Regulations (CFR), Parts 260 to 299 at <http://www.epa.gov/lawsregs/search/40cfr.html>. For database information regarding your EPA ID number, you can go to Envirofacts Data Warehouse. Enclosed is an instruction on how to use the national EPA Envirofacts Data Warehouse. If you wish to search for specific information, go to our main website at [www.epa.gov](http://www.epa.gov) or at EPA Region 10's web site for the Seattle, WA Office, covering the States of Alaska, Idaho, Oregon and Washington at [www.epa.gov/r10earth](http://www.epa.gov/r10earth). You will also find helpful information at the back of this letter.

Please feel free to contact me if you have any questions regarding the use of this EPA ID number. I can be reached via e-mail at [erickson.ofelia@epa.gov](mailto:erickson.ofelia@epa.gov) or you can call (206) 553-2583.

Sincerely,

Ofelia S. Erickson  
Resource Management & RCRA State Programs Unit

Enclosures (2)

## HELPFUL INFORMATION:

### FOR ALL FACILITIES:

- You should inactivate your EPA ID number when your facility no longer engages in hazardous waste activities. Please notify us via U.S. mail on your company's letterhead the reason(s) for inactivation and the effective date. Be sure to include the original signature of an authorized person.
- Facility that changed ownership or location must re-notify EPA Region 10 by completing a new RCRA Subtitle C Site Identification Form (Standard Form 8700-12). The form can be downloaded from <http://www.epa.gov/epawaste/inforesources/data/form8700/forms.htm#waste> . For other changes and subsequent notification, such as the contact person, mailing address, NAICS, hazardous waste activities, etc., we recommend that you use the same form.
- Please mail requests and changes to:

US Environmental Protection Agency, Region 10  
Attn: Alaska EPA ID Number Specialist  
1200 Sixth Avenue, Suite 900, M/S AWT-122  
Seattle, WA 98101

**HW GENERATORS:** Your EPA ID number is location-specific, and assigned to the physical location where wastes are being generated. EPA ID numbers do not move if a company relocates. Each new owner of the site, if engaging in hazardous waste activities, must re-apply for the ID number prior to their first hazardous waste activity. You will need a new EPA ID number for your new location.

**IF YOU ARE ONLY A HW TRANSPORTER:** If you transport HW commercially and it is your sole regulated HW activity, your location address must be either your Corporate address or the location from which your HW transporting trucks originate.

**COMPANIES THAT BOTH GENERATE AND TRANSPORT HW:** Same instructions as HW generators; your EPA ID number is location-specific.

**FACILITIES THAT TREAT/STORE/DISPOSE (TSD) OF HW:** This type of HW activity must be issued a RCRA operating permit or interim status by EPA prior to any HW TSD activity. This category of facility is usually a site such as an incinerator permitted to dispose of HW, or a specially constructed landfill permitted to take HW, or a permitted storage facility for HW or HW waste piles undergoing formal closure. Facilities in this category generally must complete the Notification of Regulated Waste Activity Form 8700-12 and the RCRA Part A and B Forms (SF 8700-23 A & B).

## WHERE TO FIND ON-LINE ANSWERS TO YOUR RCRA QUESTIONS

**Hazardous Waste Questions and Answers:** <http://waste.custhelp.com>

**RCRA Online Questions and Answers:** <http://www.epa.gov/rcraonline/>



Terri  
Griffith/R10/USEPA/US  
10/09/2009 06:38 PM

To Ofelia Erickson/R10/USEPA/US@EPA  
cc Ted Enderle/R10/USEPA/US@EPA  
bcc  
Subject Fw: Site Identification Form and Application for EPA Number

----- Forwarded by Terri Griffith/R10/USEPA/US on 10/09/2009 06:37 PM -----



"Joshua L. Reynolds"  
<JReynolds@alutiiq.com>  
>  
10/09/2009 06:28 PM

To Terri Griffith/R10/USEPA/US@EPA  
cc "John Donnelly" <JDonnelly@alutiiq.com>, Dennis Swarthout  
<dswarthout@alutiiq.com>  
Subject Site Identification Form and Application for EPA Number

Terri,

I have attached a completed EPA Form 8700-12 as required to identify my site as a generator of hazardous waste and to request an EPA number. Please do not hesitate to reply to this message or to call me at the contact listed below if there are any questions.

Respectfully,

*Josh Reynolds*  
HSE Manager  
Alutiiq Oilfield Solutions, LLC  
Formerly Compositech  
907.659.9846 office  
(b) (6) cell



Alutiiq Site Identification and EPA Number Application.pdf